

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHEVRON CORPORATION,

Plaintiff,

-against-

11 Civ. 0691 (LAK)

STEVEN DONZIGER, et al.,

Defendants.

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SPECIAL MASTERS ORDER NO. 3

Except to the extent the relevant Special Master directs otherwise, the following ground rules shall apply to all depositions supervised by a Special Master. Depositions scheduled to occur in Lima, Peru will be addressed by separate order.

(1) To ensure seven hours of actual testimony per day, depositions will commence at 9:00 a.m. sharp, with a 15 minute break in the morning, a 45 minute break for lunch, and a 15 minute break in the afternoon. Counsel should be prepared to arrive early and stay late to address any issues that do not require the presence of the witness.

(2) There shall be no speaking objections in the presence of the witness: objections shall be limited to “objection, form”; “objection, relevance”; “objection, privilege”; etc. If counsel object on privilege grounds to and instruct a witness to refrain from answering a particular question, the objection will be addressed, if practical, at the next break, or the witness will be asked to leave the deposition room, and the objection will be addressed by the Special Master at that point.

(3) To the extent film clips or audio recordings will be used in a given deposition, counsel shall ensure that each such clip or recording is accompanied by an official transcript (with English translation where required). Such transcripts should be marked as sub-exhibits to the clip or recording to which they relate. If the clip is used to describe action or inaction rather than speech content, counsel should, through questioning, elicit all the relevant action/inaction, in part to ensure that any reader of the transcript will understand the context of the questions being asked.

(4) Counsel are directed to ensure that a printer and internet access are available in the Special Master's break-out room. Counsel hosting the deposition shall further ensure that the court reporter has the ability to print portions of the transcript if requested to do so by the Special Master.

(5) To the extent a given witness is represented by counsel who have not appeared in this matter, counsel for Chevron is directed to serve a copy of this Order on the witness's counsel as far in advance of the deposition date as is practicable.

So ordered.

Dated: April 22, 2013
New York, New York

/s/ Theodore H. Katz
Theodore H. Katz
Special Master

/s/ Max Gitter
Max Gitter
Special Master